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August 19, 2016

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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COMMISSION
CLERK

Re: Docket No. 160001-EI

REDACTED

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in Response to Office of Public Counsel's Third Set of Interrogatories (Nos. 67 and 72). The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declaration in support of FPL's request.

COM _____ Please contact me if you or your Staff has any questions regarding this filing.

AFD *Redacted only

APA _____

ECO _____


ENG _____

GCL _____

IDM _____ Enclosure

TEL _____ cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

CLK _____

Sincerely,

Joel Baker

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 160001-EI

Date: August 19, 2016

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO
OFFICE OF PUBLIC COUNSEL'S THIRD SET
OF INTERROGATORIES (Nos. 67 and 72)**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain information provided in response to Office of Public Counsel's ("OPC") Third Set of Interrogatories (Nos. 67 and 72) ("Confidential Discovery Responses"). In support of its Request, FPL states as follows:

1. On July 22, 2016, OPC served its Third Set of Interrogatories (Nos. 66-73) on FPL. FPL's Response to OPC's Third Set of Interrogatories (Nos. 67 and 72) contain information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to OPC's Third Set of Interrogatories (Nos. 66-73) on August 19, 2016. This request is being filed in order to request confidential classification of the Confidential Discovery Responses consistent with Rule 25-22.006, Florida Administrative Code.

3. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the Confidential Discovery Responses on which all information that FPL asserts is entitled to confidential treatment is highlighted.

b. Exhibit B consists of an edited version of the Confidential Discovery Responses on which all information that FPL asserts is entitled to confidential treatment is redacted.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A, together with references to the specific statutory bases for the claim of confidentiality and to the affidavit in support of the requested confidential classification.

d. Exhibit D is the declaration of Gerard J. Yupp in support of this Request.

4. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

5. As described more fully in the declaration included as Exhibit D, the Confidential Discovery Responses provided by FPL contains information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Additionally, certain information relates to the competitive interests of FPL and its vendors, the disclosure of which would impair their competitive interests. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

John T. Butler
Assistant General Counsel - Regulatory
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By: _____

Joel Baker
Florida Bar No. 0108202

CERTIFICATE OF SERVICE

Docket No. 160001-EI

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential

Classification has been furnished by electronic mail this 19th day of August, 2016 to the following:

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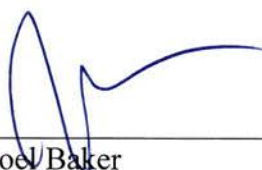
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By: _____


Joel Baker
Florida Bar No. 0108202

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

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EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

Q.

Projected natural gas financial hedging gains or losses for 2017 as of July 31, 2016:

- a. Please provide the projected natural gas hedging gain or loss for calendar year 2017 based on the hedging positions the Company has already executed.**
- b. As part of this response, what percentage of the total anticipated natural gas burn for 2017 has already been hedged?**

A.

a) Based on the August 1, 2016 forward curve, FPL currently estimates a natural gas financial hedging benefit of \$51,032,744 for calendar year 2017, from transactions in place at the end of July 2016.

- ¹ b) At the end of July 2016, FPL had financially hedged approximately [REDACTED]^c of the total projected natural gas burn for 2017.

Q.

As of the June 9, 2016 Agenda Conference and pursuant to the unmodified 2016 Risk Management Plan:

- a. What months remained unhedged for 2017 (i.e., where the hedging procurement for those months was not fully executed)?**
- b. How much volume of natural gas was hedged?**
- c. How much volume of natural gas remained to be hedged?**

A.

- a. As explained in FPL's response to OPC's Third Set of Interrogatories No. 71, as of the June 9, 2016 Agenda Conference, FPL had not fully hedged any month in 2017 pursuant to the unmodified 2016 Risk Management Plan.
- b. As of the June 9, 2016 Agenda Conference, FPL had financially hedged approximately [REDACTED]^D of natural gas for calendar year 2017.
- c. As of the June 9, 2016 Agenda Conference, approximately [REDACTED]^E of natural gas remained to be hedged for calendar year 2017.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
DOCKET NO: 160001-EI
SUBJECT: FPL's Responses to OPC's 3rd Set of Interrogatories Nos. 67 and 72
DATE: August 19, 2016

OPC's 3rd Interrog. (No.)	Page Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
67	1	Percentage of natural gas hedged for 2017	Line 1C	(d), (e)	G. Yupp
72	1	Volume of natural gas hedged for 2017	Lines 1D, 2E	(d), (e)	G. Yupp

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No: 160001-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

DECLARATION OF GERARD J. YUPP

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading Division. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information consist of the details of FPL's strategy and plans for hedging natural gas. Additionally, the confidential information relates to competitive interests and hedging-related bids or other contractual data, the disclosure of which would impair the competitive business as well as the efforts of FPL to contract for goods and services on favorable terms, also to the detriment of FPL and its customers. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



GERARD J. YUPP

Date: 8/15/16